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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

This Document Relates to:

ALL DIRECT PURCHASER ACTIONS

**DECLARATION OF R. ALEXANDER
SAVERI IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS'
ADMINISTRATIVE MOTION TO SEAL
DOCUMENTS PURSUANT TO CIVIL
LOCAL RULES 7-11 AND 79-5(d)**

1 I, R. Alexander Saveri, declare:

2 1. I am the Managing Partner of Saveri & Saveri, Inc., Lead Counsel for Direct
3 Purchaser Plaintiffs (“DPPs” or “Plaintiffs”) in this action. I am a member of the Bar of the State of
4 California and admitted to practice in the Northern District of California. Except as otherwise
5 stated, I have personal knowledge of the facts stated below.

6 2. I make this Declaration in Support of Plaintiffs’ Administrative Motion to Seal
7 Documents Pursuant to Civil Local Rules 7-11 and 79-5(d) whereby Plaintiffs move the Court for
8 leave to file the following documents, or portions thereof, under seal:

- 9 • Gray highlighted portions of the Direct Purchaser Plaintiffs’ Opposition to the Irico
10 Defendants’ Motion to Set Aside Default;
- 11 • Gray highlighted portions of Exhibit 11 to the Declaration of R. Alexander Saveri in
12 Support of Direct Purchaser Plaintiffs’ Opposition to the Irico Defendants’ Motion to
13 Set Aside Default;
- 14 • Exhibits 12-32 to the Declaration of R. Alexander Saveri in Support of Direct Purchaser
15 Plaintiffs’ Opposition to the Irico Defendants’ Motion to Set Aside Default that contain
16 documents that Defendants have designated “Confidential” or “Highly Confidential”;
17 and
- 18 • Exhibit 4 to the Declaration of Cadio Zirpoli in Support of Direct Purchaser Plaintiffs’
19 Opposition to the Irico Defendants’ Motion to Set Aside Default that contain documents
20 that Defendants have designated “Confidential” or “Highly Confidential”

21 3. On June 18, 2008, the Court approved a Stipulated Protective Order in this matter.
22 ECF No. 306 (“Protective Order”).

23 4. Section 10 of the Protective Order requires that “a Party may not file in the public
24 record in this action any Protected Material. A Party that seeks to file under seal any Protected
25 Material must comply with Civil Local Rule 79-5.”

26 5. Plaintiffs seek to file the documents (or portions thereof) listed above in Paragraph 2
27 under seal pursuant to certain orders regarding the sealing of documents issued by this Court.

28 6. The documents (or portions thereof) identified in Paragraph 2 have been designated
29 as confidential by the Chunghwa Defendants, the Irico Defendants, the Panasonic Defendants, and
30 the Samsung SDI Defendants.

1 Document	Designating Entity
2 Gray highlighted portions of the Direct Purchaser Plaintiffs' Opposition to the Irico Defendants' Motion to Set Aside Default	3 Chunghwa Defendants, the Irico Defendants, and the Samsung SDI Defendants.
4 Gray highlighted portions of Exhibit 11 to the Saveri Declaration	5 Chunghwa Defendants and the Samsung SDI Defendants.
6 Exhibit 12 to the Saveri Declaration: CHU00030684-87	7 Chunghwa Defendants
8 Exhibit 13 to the Saveri Declaration: CHU00030705-08	9 Chunghwa Defendants
10 Exhibit 14 to the Saveri Declaration: CHU00030734-37	11 Chunghwa Defendants
12 Exhibit 15 to the Saveri Declaration: CHU00029191-94	13 Chunghwa Defendants
14 Exhibit 16 to the Saveri Declaration: CHU00030769-70	15 Chunghwa Defendants
16 Exhibit 17 to the Saveri Declaration: CHU00029050-51	17 Chunghwa Defendants
18 Exhibit 18 to the Saveri Declaration: Excerpt of the transcript of the deposition of Jing Song Lu on February 28, 2013	19 Chunghwa Defendants
20 Exhibit 19 to the Saveri Declaration: CHU00030797-98	21 Chunghwa Defendants
22 Exhibit 20 to the Saveri Declaration: SDCRT-0086672-74	23 Samsung SDI Defendants
24 Exhibit 21 to the Saveri Declaration: CHU00030843-45	25 Chunghwa Defendants
26 Exhibit 22 to the Saveri Declaration: CHU00030979-84	27 Chunghwa Defendants
28 Exhibit 23 to the Saveri Declaration: CHU00030992-94	29 Chunghwa Defendants
30 Exhibit 24 to the Saveri Declaration: CHU00030995-97	31 Chunghwa Defendants
32 Exhibit 25 to the Saveri Declaration: CHU00036412-13	33 Chunghwa Defendants
34 Exhibit 26 to the Saveri Declaration: CHU00040992-93	35 Chunghwa Defendants
36 Exhibit 27 to the Saveri Declaration: Excerpt of the transcript of the deposition of Sheng-Jen Yang on February 25, 2013	37 Chunghwa Defendants
38 Exhibit 28 to the Saveri Declaration: CHU00102864-65	39 Chunghwa Defendants
40 Exhibit 29 to the Saveri Declaration: CHWA00226236-69	41 Chunghwa Defendants
42 Exhibit 30 to the Saveri Declaration: CHU00030752-55	43 Chunghwa Defendants

1	Exhibit 31 to the Saveri Declaration: Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories, Nos. 4 and 5, dated November 25, 2013	Samsung SDI Defendants
2	Exhibit 32 to the Saveri Declaration: Second Supplemental Responses of Panasonic Corporation of North America, MT Picture Display Co., Ltd., and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.) to Direct Purchaser Plaintiffs' First Set of Interrogatories, dated November 3, 2013	Panasonic Defendants
3	Exhibit 4 to the Zirpoli Declaration	Irico Defendants

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7. A stipulation by the parties could not be obtained because under Civil Local Rule
8 79-5, parties may not stipulate to the filing of any document under seal. *See* Civil L.R. 7-11(a), 79-
9 5(b).

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11 I declare under the penalty of perjury under the laws of the United States of America that
12 the foregoing is true and correct.

13 Executed this 7th day of December, 2017 in San Francisco, California.

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15 /s/ R. Alexander Saveri
16 R. Alexander Saveri
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